

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF NEW YORK

FULL CIRCLE UNITED, LLC,

Plaintiff,

v.

BAY TEK ENTERTAINMENT, INC.,

Defendant.

CASE NO. 1:20-CV-03395-BMC

ORAL ARGUMENT REQUESTED

BAY TEK ENTERTAINMENT, INC.,

Counterclaim Plaintiff,

v.

FULL CIRCLE UNITED, LLC,

Counterclaim Defendant,

and

ERIC PAVONY,

Additional Counterclaim
Defendant.

**NOTICE OF MOTION *IN LIMINE* TO EXCLUDE EVIDENCE OFFERED TO SEEK
TO ESTABLISH A CONTRACTUAL OBLIGATION OF
BAY TEK TO MANUFACTURE CUSTOM LANES FOR FCU**

PLEASE TAKE NOTICE that pursuant to Rules 402 and 403 of the Federal Rules of Evidence and upon the accompanying Memorandum of Law and the Declaration of Andrew Nietes dated February 6, 2025 and exhibits appended thereto, and all prior pleadings and proceedings herein, Defendant and Counterclaim Plaintiff Bay Tek Entertainment, Inc. hereby

moves this Court to exclude any evidence and testimony proffered by Full Circle United, LLC (“FCU”) to show that Bay Tek had a contractual obligation to build custom Skee-Ball® branded lanes for FCU.

DATED: New York, New York
February 6, 2025

Respectfully submitted,
Mitchell Silberberg & Knupp LLP

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